Exhibit 2

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ADNEXUS INCORPORATED,
       Plaintiff,

  v.

META PLATFORMS, INC.
       Defendants.

Civil Action No. 6:23-cv-00152-JKP
JURY TRIAL DEMANDED

**COMPARISON OF PLAINTIFF'S ORIGINAL CLAIM CHART (DKT. 1-3) AND
PLAINTIFF'S AMENDED CLAIM CHART (DKT. 16-2)**

Below, please find a comparison of Plaintiff Adnexus Inc.'s original claim chart (Dkt. 1-3) and amended claim chart (Dkt. 16-2). For amended claim elements, a redline is provided where information added to the amended claim chart that was not present in the original claim chart is double underlined and in blue, while information that was removed from the original claim chart and not present in the amended claim chart is in red strikethrough. Unless otherwise noted, no amendments were made to the amended claim chart.

1.   Plaintiff's claim charts are broken up by claim element, where each claim chart contains elements [1a] through [1i]. (*See* Dkt. 1-3; Dkt. 16-2.)

2.   Plaintiff made one amendment to claim element [1a] in the amended claim chart, adding the below statements. (*Compare* Dkt. 1-3 p. 1 *with* Dkt. 16-2 p. 1.)

> Meta Lead Ads together with various equipment, services, components, and/or software utilized in providing Meta Lead Ads collectively include a system and method of on-line advertising as described by the meaning of this claim. Meta Lead Ads is made available by a system owned and/or operated by Meta.
>
> "Because infringement liability is not dependent on ownership, e.g., use of a system can infringe (35 U.S.C. § 271), infringement is not dependent on ownership of all limitations of a claim."

3.   Plaintiff made no amendments to claim element [1b] in the amended claim chart. (*Compare* Dkt. 1-3 pp. 1-3 *with* Dkt. 16-2 pp. 1-3.)

4.   Plaintiff made no amendments to claim element [1c] in the amended claim chart. (*Compare* Dkt. 1-3 pp. 3-4 *with* Dkt. 16-2 pp. 3-4.)

5.   Plaintiff amended the introductory paragraph to claim element [1d] in the amended claim chart as shown below, but made no further amendments. (*Compare* Dkt. 1-3 p. 4 *with* Dkt. 16-2 p. 4.)

> Meta Lead Ads can use cookies to store and receive identifiersinformation and verify user account logins. When a user logs in to Facebook, user details are stored in a cookie to allow the user to navigate between pages without having to log in every time. The cookie can contain information that allows the site to identify the user and device. When a target user clicks on an ad, Meta Lead Ads can check for user identification information in the cookies on the device and if present, automatically pull information from the person's profile to complete prefilled fields on the form.

6.   Plaintiff amended the introductory paragraph to claim element [1e] in the amended

claim chart as shown below, but made no further amendments. (*Compare* Dkt. 1-3 p. 5 *with* Dkt.

16-2 pp. 4-5.)

Meta Lead Ads can display text fields for target customers to enter information. Meta Lead Ads can
prompt the target user to enter missing information that could not be pulled from their profile into a~~the~~
empty text ~~field~~fields within the lead ad. This information can be associated with the user through
cookies, acting as user profile information, which can then be stored on the computing device of the
recipient.

7.   Plaintiff amended the introductory paragraph to claim element [1f] in the amended

claim chart as shown below. (*Compare* Dkt. 1-3 p. 6 *with* Dkt. 16-2 p. 6.)

Meta Lead Ads can use cookies to store and receive identifiers and verify user account logins. When a
user logs in to Facebook, user details are stored in a cookie to allow the user to navigate between pages
without having to log in every time. The cookie allows the site to identify the user. When a target user
clicks on an ad, Meta Lead Ads can check for user identification information in the cookies on the device
and if present, automatically pull information from the person's profile to complete prefilled fields on
the form. These prefilled fields can include contact information, delivery method preferences, and
demographic information.

8.   Plaintiff added one new citation to claim element [1f] in the amended claim chart,

shown below. (*Compare* Dkt. 1-3 pp. 6-7 *with* Dkt. 16-2 pp. 6-7.)

Add custom questions.
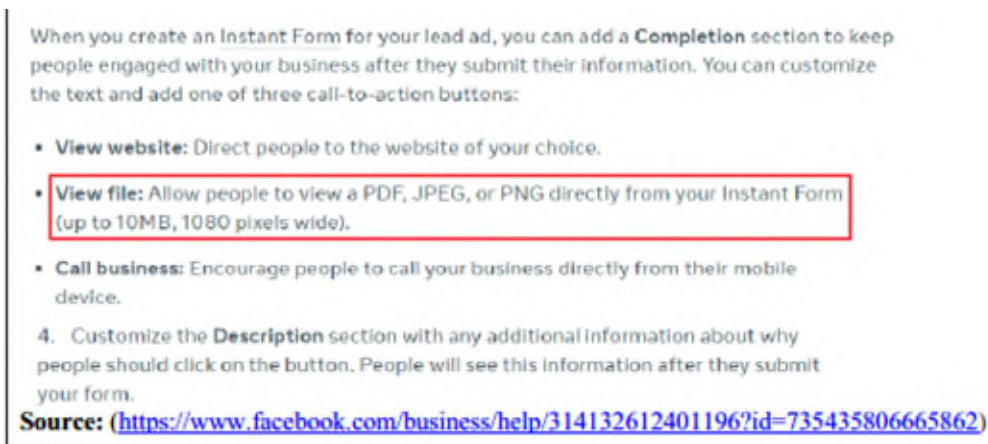
Tailor your questions in lead ads so you can
uncover their preferences, and ensure you're
reaching out to the right people with the right
information.

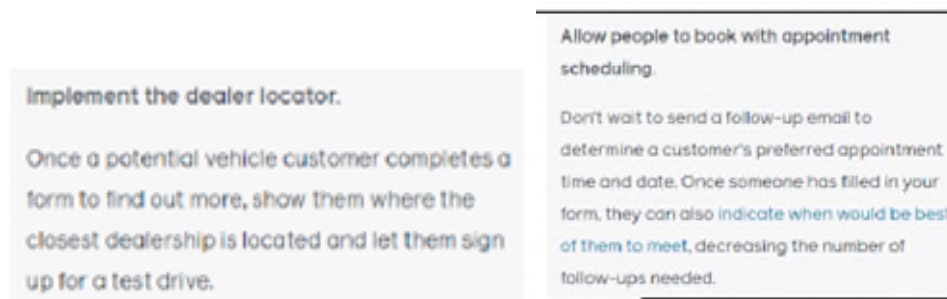**Source:** (https://www.facebook.com/business/ads/lead-ads)

9.   Plaintiff amended the introductory paragraph to claim element [1g] in the amended

claim chart as shown below. (*Compare* Dkt. 1-3 p. 8 *with* Dkt. 16-2 p. 8.)

2

Meta Ads Manager can allow advertisers to retrieve additional information associated with the advertisement such as the recipient's location and availability, which can be used to identify nearby physical locations to the recipient. It can also provide the recipient with additional information about the closest physical location for the service or product, such as a vehicle dealership, based on this information directly from the Instant Form.

10.   Plaintiff added one new citation to claim element [1g] in the amended claim chart, shown below. (*Compare* Dkt. 1-3 p. 8 *with* Dkt. 16-2 p. 8.)

> When you create an Instant Form for your lead ad, you can add a **Completion** section to keep people engaged with your business after they submit their information. You can customize the text and add one of three call-to-action buttons:
>
> - **View website:** Direct people to the website of your choice.
> - **View file:** Allow people to view a PDF, JPEG, or PNG directly from your Instant Form (up to 10MB, 1080 pixels wide).
> - **Call business:** Encourage people to call your business directly from their mobile device.
>
> 4. Customize the **Description** section with any additional information about why people should click on the button. People will see this information after they submit your form.
>
> **Source:** (https://www.facebook.com/business/help/314132612401196?id=735435806665862)

11.   Plaintiff deleted two citations for claim element [1g] in the amended claim chart, shown below. (*Compare* Dkt. 1-3 pp. 8-9 *with* Dkt. 16-2 pp. 8-9.)

Implement the dealer locator.

Once a potential vehicle customer completes a form to find out more, show them where the closest dealership is located and let them sign up for a test drive.

Allow people to book with appointment scheduling.

Don't wait to send a follow-up email to determine a customer's preferred appointment time and date. Once someone has filled in your form, they can also indicate when would be best of them to meet, decreasing the number of follow-ups needed.

12.   Plaintiff amended the introductory paragraph to claim element [1h] in the amended claim chart as shown below, but made no further amendments. (*Compare* Dkt. 1-3 p. 9 *with* Dkt. 16-2 p. 9.)

3

Meta Lead Ads can allow target users to engage with advertisements without leaving the app or manually entering all of their information. This lets the users sign up ~~for receiving~~to receive more information without interrupting their browsing session. Meta Lead Ads can allow advertisers and customers to immediately get in touch with each other through phone, Messenger, and WhatsApp.

13.   Plaintiff made no amendments to claim element [1i] in the amended claim chart.

(*Compare* Dkt. 1-3 p. 12 *with* Dkt. 16-2 p. 11.)